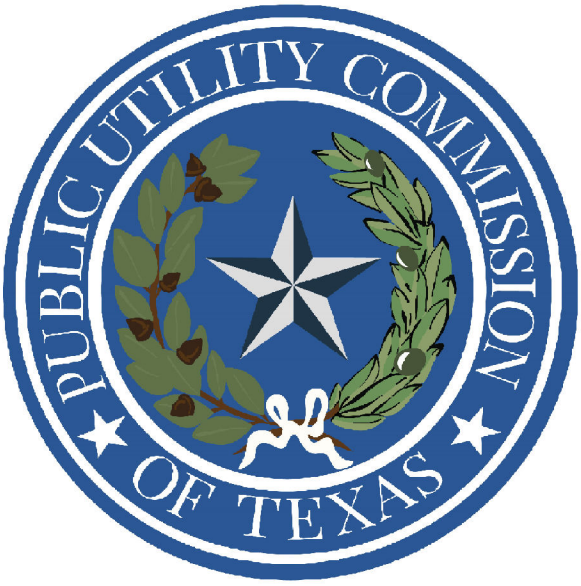

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PUCT DOCKET NO. 52455

APPLICATION OF ONCOR ELECTRIC DELIVERY COMPANY LLC TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE OLD COUNTRY SWITCH 345-KV TAP TRANSMISSION LINE IN ELLIS COUNTY	)	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS

SUPPLEMENTAL TESTIMONY OF

BRIAN C. ANDREWS

ON BEHALF OF

CHAMBERS CREEK RANCH

June 7, 2022

BRUBAKER & ASSOCIATES, INC.

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Table of Contents to the Supplemental Testimony of Brian C. Andrews

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Affidavit of Brian C. Andrews

State of Missouri)
) **SS**
County of Saint Louis)

Brian C. Andrews, being first duly sworn, on his oath states:

1. My name is Brian C. Andrews. I am an Associate with Brubaker & Associates, Inc., 16690 Swingley Ridge Road, Suite 140, Chesterfield, MO 63017. I have been retained by Chambers Creek Ranch to testify in this proceeding on their behalf.

2. Attached hereto and made a part hereof for all purposes is my supplemental testimony which was prepared in written form for introduction into evidence in Public Utility Commission of Texas Docket No. 52455.

3. I hereby swear and affirm that the testimony is true and correct and that it shows the matters and things that it purports to show.

Brian C. Andrews

Subscribed and sworn to before me this 6th day of June, 2022.

MARIA E. DECKER
Notary Public - Notary Seal
STATE OF MISSOURI
St. Louis City
My Commission Expires: May 5, 2025
Commission # 13706793

Notary Public

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Supplemental Testimony of Brian C. Andrews

I. INTRODUCTION

Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A Brian C. Andrews. My business address is 16690 Swingley Ridge Road, Suite 140, Chesterfield, MO 63017.

Q PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

A I received a Bachelor of Science in Electrical Engineering from the Washington University in St. Louis/University of Missouri - St. Louis Joint Engineering Program. I also received a Master of Science in Applied Economics from Georgia Southern University. I have attended training seminars on several topics including, but not limited to, cost estimation for transmission projects and transmission line siting. I am a certified Engineer Intern in the State of Missouri.

As an Associate at BAI, and as a Senior Consultant, Consultant, Associate Consultant, and Assistant Engineer before that, I have been involved in a variety of regulated and competitive electric service issues. These include, but are not limited to, transmission planning, transmission line routing, and transmission line cost estimation.

I have experience with power flow models, analysis of electromagnetic field issues, and transmission line routing and cost analyses. I also have experience with the modeling tools and approaches used to evaluate these issues with various programs such as Microsoft Excel, PSS/E, MatLab, ArcGIS, Google Earth and The United States Department of Energy / Bonneville Power Administration's Corona and Field Effects ("CAFE") Program. My background is further detailed in Appendix A to my testimony.

Q HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS ("PUCT" OR "COMMISSION") ON TRANSMISSION-RELATED MATTERS IN GENERAL AND IN CERTIFICATE OF CONVENIENCE AND NECESSITY ("CCN") PROCEEDINGS, IN PARTICULAR?

A Yes, I filed expert testimony in PUCT Docket Nos. 44837, 45866, 46234, 48625, 48629, 49523, 50545, 50410, 50812, 50830, 51023, 51568, and 53053. I also provided consulting and technical support for my colleague, Mr. James R. Dauphinais, for his transmission line routing testimony and exhibits filed in PUCT Docket Nos. 40728, 41606, 42087, 43599, 43878, 44547, and 46429. My involvement in those proceedings included reviewing the applicant's application and exhibits, analyzing the routing criteria and Geographical Information System ("GIS") data of the routes, identifying modifications to improve the routing factor performance of filed routes, reviewing and analyzing cost estimates of proposed routes, providing insight and recommendations for testimony, and creating exhibits for Mr. Dauphinais. I provided similar support for Mr. Dauphinais' testimony filed in transmission line CCN proceedings in Illinois, Michigan, and Alberta.

Q ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?

A I am testifying on behalf of Chambers Creek Ranch. Chambers Creek Ranch is comprised of over 3,400 contiguous acres and is an operating cattle ranch whose cattle are raised on all natural grass. The Ranch's owners take extreme care of the land and the farm animals in their care. A transmission line through Chambers Creek Ranch would undermine the environment the owners have so carefully cultivated

Q WHAT IS THE SUBJECT MATTER OF YOUR SUPPLEMENTAL TESTIMONY?

A My testimony addresses two of the route alternatives offered to the Commission by Oncor Electric Delivery Company LLC ("Oncor" or "Company") in its CCN Application ("Application") for the proposed Old Country Switch 345-kV Transmission Line Project ("Proposed Project"). I provide support for Route 152, the route that has been unanimously agreed to by all intervening parties in this case.

Q WHAT MATERIALS DID YOU REVIEW PRIOR TO THE PREPARATION OF YOUR DIRECT TESTIMONY?

A I reviewed Oncor's Application, exhibits, direct testimony, and responses to Requests For Information ("RFI"). This included a thorough review of the Environmental Assessment and Alternative Route Analysis ("EA") conducted by Freese and Nichols, Inc. ("FNI") on behalf of the Company, which is Attachment 1 to the Application. I also conducted a detailed desktop review of the GIS data and reviewed the intervenor map. Finally, I have reviewed the unanimous settlement agreement and the proposed order in this proceeding.

Q PLEASE SUMMARIZE YOUR RECOMMENDATIONS.

A Based upon my consideration of the Commission's routing factors, Route 152 meets the requirements of PURA and the PUCT Substantive Rules and should be approved by the Commission. Route 152 only has 2 habitable structures within 500 feet of the route centerline, which is a 60% reduction relative to Route 54, Oncor's recommended route. Route 152, excluding the cost of the proposed substation, has an estimated cost of $12.74 million, which is $2.35 million more than Route 54 representing just 0.02% of Oncor's rate base. Finally, all intervening parties, including the PUCT Staff and Oncor, have agreed to Route 152. For these reasons, it is my opinion the Commission should approve Route 152 for the Proposed Project.

II. ROUTE DISCUSSION

Q WHAT ROUTES WILL YOU BE DISCUSSING?

A I will provide a discussion on Routes 54 and 152. Route 54 is the route that Oncor, in its direct testimony and application, has stated is its recommended route. Route 152 is the route that all intervenors, PUCT Staff, and Oncor have agreed to in a unanimous settlement agreement.

Q WHAT ARE THE TWO MOST IMPORTANT ROUTING FACTORS TO CONSIDER IN EVALUATING OPTIONS FOR A TRANSMISSION LINE ROUTE?

A In my experience the two most important routing factors are the number of habitable structures within a certain distance of the route centerline and the estimated cost of the line. The Commission in its Final Order in Docket No. 30168, *Application of TXU Delivery Company to Amend a Certificate of Convenience and Necessity ("CCN") for a Proposed Transmission Line within Jack, Wise and Benton Counties, Texas*, noted that

it has emphasized two factors in deciding the routing of transmission lines: the cost of the line and its impact on habitable structures (Final Order at 2).

Q HOW MANY HABITABLE STRUCTURES ARE WITHIN 500 FEET OF THE CENTERLINES OF ROUTES 54 AND 152?

A Route 54 has five habitable structures within 500 feet of its route centerline. Route 152 has just two. The selection of Route 152 provides the opportunity to reduce the number of habitable structures by 60% relative to Route 54.

Q HOW DO ROUTES 54 AND 152 COMPARE IN TERMS OF ESTIMATED COST?

A Route 54 has an estimated cost of $10.39 million. Route 152 has an estimated cost of $12.74 million. Route 152 would result in an incremental cost of $2.35 million or 23% over Route 54.

Q HOW DOES THE INCREMENTAL $2.35 MILLION FOR ROUTE 152 COMPARE TO ONCOR'S TRANSMISSION RATE BASE?

A Review of Oncor's 2021 FERC Form 1 indicates that it has a gross plant in service for transmission plant of $11.348 billion[1] and an accumulated depreciation balance for transmission plant of $2.874 billion.[2] This means Oncor has a transmission rate base of $8.474 billion. The incremental $2.35 million cost for Route 152 represents just 0.02% of Oncor's rate base.

[1]Oncor's 2021 FERC Form 1 page 206, pdf page 56.
[2]Oncor's 2021 FERC Form 1 page 219, pdf page 66.

Q HOW DO ROUTES 54 AND 152 COMPARE USING THE ENVIRONMENTAL DATA PROVIDED IN THE EA?

A Table 7-2 of the EA, the Environmental Data for Alternative Route Evaluation, provides the 35[3] routing factors aside from the cost estimates. There are 21 of these routing factors that are identical for both Routes 54 and 152. Of those 21 factors, 20 for both Routes 54 and 152 have values of 0. This leaves 14 routing factors in which Routes 54 and 152 have differing values. Out of those 14, Route 152 has better performance in 7 routing factors: length parallel transmission lines, length parallel apparent property boundaries, length parallel compatible ROW, number of habitable structures within 500 feet, length across rangeland pasture, length across upland woodlands, and length of route across potential wetlands. This of course means Route 54 also has better performance in 7 routing factors as well: total length, length parallel to roads, length across cropland, length across riparian areas, number of stream crossings, length parallel streams, and length across areas of high archaeological potential.

Of the 14 routing factors in which Routes 54 and 152 differ, performance is split evenly with each route performing better in seven factors.

Q HAVE THE INTERVENING PARTIES IN THIS PROCEEDING REACHED AN AGREEMENT ON ROUTING?

A Yes, on March 13th 2022, Oncor, PUCT Staff, Ms. Anne Weary, Lone Star Texas Land & Cattle Company, LLC ("Lone Star"), Chambers Creek, Ms. Vicki Coffman Titsworth; and Mr. Luke Tamminga all entered into a unanimous settlement agreement that the Commission should approve the Proposed Project on Route 152. Route 152 will be

[3]There are actually 36 factors, however the table provides total length in both feet and miles.

located inside property boundaries belonging to Ms. Weary, Lone Star, and Mr. Tamminga. Route 152 will be parallel to, but just outside, the Chambers Creek Ranch. Lastly, Route 152 may just touch the northwest corner of Ms. Titsworth's property. The fact that the landowners impacted by this Proposed Project have agreed to Route 152 being on, or very near their properties should viewed favorably as a community values criterion and should sway the Commission to approve Route 152 over 54. Further, the increased cost of Route 152 should not dissuade the Commission from approving the settlement. In this case, given the marginal effect of the increase in estimated costs on Oncor's rate base, the estimated cost difference between Route 152 and Route 54 is insufficient to move the needle against approval of the unanimous settlement agreement.

Q DOES THIS CONCLUDE YOUR SUPPLEMENTAL TESTIMONY?

A Yes, it does.

Qualifications of Brian C. Andrews

Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A Brian C. Andrews. My business address is 16690 Swingley Ridge Road, Suite 140, Chesterfield, MO 63017.

Q PLEASE STATE YOUR OCCUPATION.

A I am an Associate with the firm of Brubaker & Associates, Inc. ("BAI"), energy, economic and regulatory consultants in the field of public utility regulation.

Q PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL EMPLOYMENT EXPERIENCE.

A I received a Bachelor of Science Degree in Electrical Engineering from the Washington University in St. Louis/University of Missouri - St. Louis Joint Engineering Program. I have also received a Master of Science Degree in Applied Economics from Georgia Southern University.

I have attended training seminars on multiple topics including class cost of service, depreciation, power risk analysis, production cost modeling, cost-estimation for transmission projects, transmission line routing, MISO load serving entity fundamentals and more.

I am a member and a former President of the Society of Depreciation Professionals. I have been awarded the designation of Certified Depreciation Professional ("CDP") by the Society of Depreciation Professionals. I am also a certified Engineer Intern in the State of Missouri.

As an Associate at BAI, and as a Senior Consultant, Consultant, Associate Consultant and Assistant Engineer before that, I have been involved with several regulated and competitive electric service issues. These have included book

depreciation, fuel and purchased power cost, transmission planning, transmission line routing, resource planning including renewable portfolio standards compliance, electric price forecasting, class cost of service, power procurement, and rate design. This has involved use of power flow, production cost, cost of service, and various other analyses and models to address these issues, utilizing, but not limited to, various programs such as Strategist, RealTime, PSS/E, MatLab, R Studio, ArcGIS, Excel, and the United States Department of Energy/Bonneville Power Administration's Corona and Field Effects ("CAFÉ") Program. In addition, I have received extensive training on the PLEXOS Integrated Energy Model and the EnCompass Power Planning Software. I have provided testimony on many of these issues before the Public Service Commissions in Arizona, Arkansas, Colorado, Florida, Illinois, Indiana, Kansas, Louisiana, Michigan, Minnesota, Missouri, Montana, New Mexico, Oklahoma, Texas, and Washington DC.

BAI was formed in April 1995. BAI provides consulting services in the economic, technical, accounting, and financial aspects of public utility rates and in the acquisition of utility and energy services through RFPs and negotiations, in both regulated and unregulated markets. Our clients include large industrial and institutional customers, some utilities and, on occasion, state regulatory agencies. We also prepare special studies and reports, forecasts, surveys and siting studies, and present seminars on utility-related issues.

In general, we are engaged in energy and regulatory consulting, economic analysis and contract negotiation. In addition to our main office in St. Louis, the firm also has branch offices in Corpus Christi, Texas; Detroit, Michigan; Louisville, Kentucky and Phoenix, Arizona.